

FILED

JUL 18 2018

CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF ILLINOIS
EAST ST. LOUIS OFFICE

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

UNITED STATES OF AMERICA,

Plaintiff,

vs.

MICHAEL BELL, and
KELLY SEEGER,

Defendants.

CASE NUMBER

18-30121-NJR

Title 18, United States Code,
Sections 371, 471, 472

INDICTMENT

THE GRAND JURY CHARGES:

COUNT 1

Conspiracy to Manufacture Counterfeit Obligations of the United States

1. From in and around November of 2017 to on or about April 9, 2018, in Madison County, within the Southern District of Illinois, and elsewhere,

**MICHAEL BELL, and
KELLY SEEGER,**

defendants herein, conspired and agreed, together to commit an offense against the United States, that is, with intent to defraud, did falsely make and counterfeit obligations of the United States and also did conceal and possess with intent to pass counterfeited obligations of the United States, that is, counterfeit Federal Reserve Notes, in violation of Title 18, United States Code, Sections 471 and 472.

Overt Acts

2. In furtherance of the conspiracy and to accomplish its objects, defendants **MICHAEL BELL** and **KELLY SEEGER** committed the following overt acts, among others, in the Southern District of Illinois:

3. On or about March 17, 2018, defendant **KELLY SEEGER** stole printer ink cartridges consistent with those used by the printer utilized in the manufacture of counterfeit Federal Reserve Notes from a local Granite City business, in Granite City, Illinois, within the Southern District of Illinois.

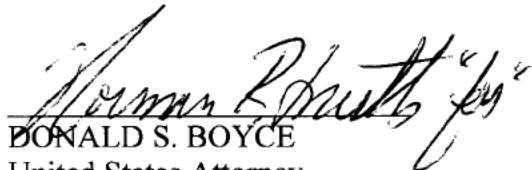
4. On or about March 18, 2018, defendant **KELLY SEEGER** was stopped by law enforcement and in her vehicle did have concealed items for the counterfeiting of Federal Reserve Notes including printers and ink consistent with those used for the manufacture of counterfeit Federal Reserve Notes as well as uncut pages of counterfeit Federal Reserve Notes in a binder marked **MICHAEL BELL**.

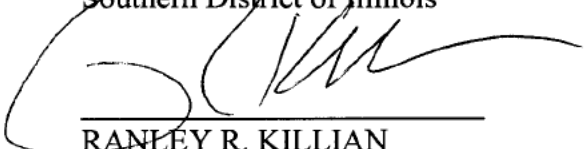
5. On or about April 9, 2018, defendants **MICHAEL BELL** and **KELLY SEEGER** were stopped by law enforcement in possession of a mutilated \$100 Federal Reserve Note consistent with those manufactured during the course of the conspiracy.

All in violation of Title 18, United States Code, Section 371.

A TRUE BILL


FOREPERSON


DONALD S. BOYCE
United States Attorney
Southern District of Illinois


RANLEY R. KILLIAN
Assistant United States Attorney

Bond Recommendation: \$10,000 unsecured